

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRUNO HOFMAN, Individually and on Behalf of
All Others Similarly Situated

Plaintiff,

v.

PHILIP LAUGHLIN, MICHAEL SABOLINSKI,
ALBERT ERANI, DONNA ABELLI LOPOLITO,
JOHN J. ARCARI, HERBERT M. STEIN, ALAN
ADES, BERNARD A. MARDEN, ALAN W.
TUCK, NOVARTIS PHARMA AG and
PRICEWATERHOUSECOOPERS LLP,

Defendants

No. 04-10027-JLT

**STIPULATION AND ORDER TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Plaintiff and defendants Alan Ades and Albert Erani (collectively, “defendants”), by their undersigned counsel, hereby stipulate and agree that the time within which they and any other defendants for whom Hale and Dorr LLP appears, may answer, move, or otherwise respond to the complaint in this action is extended to and including 45 days after the later of: (a) the Court’s selection of a lead plaintiff pursuant to § 21D(a)(3) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78a, et seq.), or (b) the date on which a consolidated amended complaint, if any, is served upon defendants, either pursuant to a Court order issued in connection with the selection of a lead plaintiff or otherwise, or by agreement of the plaintiff in this action and the plaintiff(s) in any other action which is filed in this Court and which asserts claims similar to those alleged in the above-captioned action.

This Stipulation is the same as (but for the additional defendants) as that allowed by the Court on March 1, 2004 with respect to Defendants Philip Laughlin, Michael Sabolinski and Donna Abelli Lopolito.

The plaintiff and defendants respectfully request that the Court approve their stipulation.

Respectfully Submitted,

Plaintiff,

By his attorney,

Respectfully Submitted,

PHILIP LAUGHLIN, MICHAEL
SABOLINSKI, DONNA ABELLI
LOPOLITO, ALAN ADES and ALBERT
ERANI,

By their attorneys,

/s/ Nancy Freeman Gans (by permission)

Nancy Freeman Gans (BBO #184540)

Moulton & Gans, P.C.

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(617) 369-7979

March 10, 2004

/s/ Jonathan A. Shapiro

Jeffrey B. Rudman (BBO #433380)

Jonathan A. Shapiro (BBO #567838)

HALE AND DORR LLP

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Boston, MA 02109

(617) 526-6000

SO ORDERED:

Dated: _____

Joseph L. Tauro
United States District Judge

CERTIFICATE OF SERVICE

I, Jonathan A. Shapiro, hereby certify that I caused a copy of the within documents to be served by either electronic mail or overnight mail to:

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/s/Jonathan A. Shapiro

Jonathan A. Shapiro

Dated: March 10, 2004